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April 10, 2007

VIA ELECTRONIC FILING

Marlene H. Dortch,  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

RE: **WC Docket No. 05-196**  
**Callcentric Inc. – 911 COMPLIANCE STATUS REPORT**

Dear Ms. Dortch,

Callcentric Inc. (“Callcentric”) which formerly reported under Accatel Technologies Inc, is filing this letter in response to the Commission’s letter dated March 12, 2007 requesting details of Callcentric’s 911 compliance in accordance with the Commissions rules enacted under the “VoIP 911 Order.”

Callcentric began offering both “Interconnected” and non “Interconnected” services to customers worldwide in July 2005 including US customers. Due to the Commissions ruling on “Interconnected VoIP service providers” Callcentric ceased offering all services to new US based customers on November 28, 2005 in accordance with our interpretation of the Commissions ruling. Between November 28, 2005 and August 9, 2006 Callcentric did not allow any customers from the US to subscribe to Callcentric’s services; and clearly indicated on our website (which is the only place we sell services) that this was due to the Commissions ruling.

Callcentric has purchased 911 network backbone services from Dash911 Solutions (“Dash911”), and re-opened our services to US based customers on August 9, 2006. Dash911’s “backbone” infrastructure is provided by Intrado; a company that is well known to the Commission and supplies the 911 backbone infrastructure to many (if not the majority) of the interconnected VoIP service providers operating in the US today.

At this time we are writing to inform you that we cannot provide the full details requested in your letter; as the information necessary to respond to your questions has not been made available to us by our 911 provider - Dash911; and Dash911 has in turn not been provided the necessary information to pass along to companies such as ours by their backbone provider – Intrado. Attached is a copy of a letter sent to the Commission by Dash911 President Gregory

Giagnocavo dated March 22, 2007 detailing this fact and requesting an extension on behalf of all of Dash911's customers, including and as it applies to Callcentric as well as all of Dash911's customers that received similar letters requesting a 911 compliance status report.

Callcentric fully understands the information you have requested in your letter, and fully intends to respond in full detail once we have the coverage information necessary to answer your inquiry. However; we cannot provide this information as it is not publicly available, and we must rely upon our 911 network provider – Dash 911, and in turn their backbone provider – Intrado to provide us with detailed coverage information which we must then match to our own customer information.

The information we can provide to you at this time is detailed below; and we will be following up with direct responses to your questions as soon as we have received the necessary information to complete this compliance status report.

**Details currently available:**

As background, Callcentric is a VoIP network provider which offers both free and paid services to business and residential customers in locations throughout the world. This includes both “Interconnected” and non “Interconnected” services. Callcentric currently provides services to customers in over 150 countries worldwide; and currently less than 25% of Callcentric's customers are, or have ever been located in the United States.

- **Provision of Compliant 911 Service**

Callcentric currently supplies 911 or E911 service to over 99% of our customers that have stated they are using our service from within the United States and that have purchased “Interconnected” services. Specific details of coverage and 911, E911, or other type of coverage cannot be supplied at this time as we do not have the necessary information to break-down the coverage types. Where Callcentric can provide 911 service based on Dash911/Intrado's infrastructure; 911 services are provisioned automatically within 20 minutes for over 95% of our customers that purchase an “Interconnected” service.

- **911 Coverage**

Currently we provide coverage to all locations of the US that Dash911 and in turn Intrado's coverage extends. We believe that the Commission is aware of Intrado's current coverage area; however we will provide this information as soon as it is provided to us by Dash911.

- **911 Routing Information/Connectivity to Wireline E911 Network**

Callcentric cannot currently provide an answer to this question as we do not have the details of Dash911/Intrado's coverage.

- **New VoIP Customers and/or Marketing of VoIP Service in Non-Compliant Areas:**

As mentioned previously Callcentric completely ceased offering services to US customers during the timeframe we were unable to provide 911 service. Callcentric never marketed its services in the US prior to having connectivity with Dash911 to provide 911 service.

As of the date of this letter Callcentric does not market services with any geographic specificity in the US. Of the very few customers that have purchased “Interconnected” services from Callcentric; that are located in the US; and that we have not been able to provide 911 service to – Callcentric has cancelled these customers “Interconnected” services in compliance with our interpretation of the Commissions rules. To date less than 1% of our customers in the US currently still have active “Interconnected” services where we cannot provide 911 service. Any US customer that we are unable to provide 911 service we have communicated the fact that we cannot provide them services due to the Commissions rules; and their “Interconnected” services are cancelled effective their next billing period which usually equates to less than one calendar month.

Finally, we understand and accept the Commissions request for this information; and will be providing it as soon as the companies we have contracted to provide us with 911 service are able to provide us with the details necessary to fully answer the Commissions inquiry.

Sincerely,

/s/

Gregory Borodiansky  
Chief Technology Officer  
Callcentric Inc.

Attachment: March 22, 2007 Dash911 Letter

CC:

Kathy Berthot - [kathy.berthot@fcc.gov](mailto:kathy.berthot@fcc.gov)

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March 22, 2007

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**RE: WC Docket No. 05-196**  
**Request Letter to VoIP Providers for Update on 9-1-1 Service**

REQUEST FOR A FOURTEEN-DAY EXTENSION OF TIME TO FILE

Dear Secretary Dortch,

We are a 9-1-1 service provider, providing nomadic 9-1-1 services to Voice over Internet Protocol (VoIP) provider companies in the USA. Our service meets the requirements of the FCC for VoIP providers.

Our "backbone" provider is Intrado, a company well known to the FCC, and we provide the same level of service and geographic coverage area that Intrado provides to VoIP providers nationwide. As you are aware, Intrado was mentioned in the original FCC order as a company that the FCC considered as an example of the type of 9-1-1 service coverage considered desirable.

Many of our customers, VoIP providers, to whom we provide 9-1-1 services have received the letter that the FCC is sending out (dated around the March 12<sup>th</sup>, 2007 date), requesting updated information as to 9-1-1 coverage and service provided to their subscribers.

Our VoIP customers are fully prepared to provide this information to the FCC.... however, they can not do so until we here at Dash911 provide to them the PSAP listings overlaid with 9-1-1 service and geographic coverage data. And Dash911 is unable to provide that detailed information until we, ourselves, receive the data from Intrado.

Intrado has informed us that they will generate the data sheets and tables regarding their v911 Mobility Service (9-1-1 for VoIP) – this is our backbone service that powers the core of our 9-1-1 service. However, Intrado has told us that they cannot get that information to us until approximately April 5<sup>th</sup>, 2007.

If we were, in fact, able to get all the raw data from Intrado by the 5<sup>th</sup> of April, we would not be able to process that information and create an informational reporting packet for our VoIP customers in the time required for them to make their reports to the FCC by the Letter's stated deadline of April 11<sup>th</sup>. There simply is not enough time to do so.

We respectfully request, on behalf of our more than 150 VoIP customers, a fourteen-day extension of time to file those "9-1-1 Service Update Reports" – because we simply cannot reasonably be expected to provide to our customers the data and information they require to make an accurate filing.

We have always and fully cooperated, and assisted our many VoIP customers, in providing complete and timely information to the FCC. However, in this case, we do need the extra 14 days in order to accurately provide the requested information.

Please contact me directly with any questions or for additional information.

Sincerely,  
Dash911

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